

ATTACHMENT C

RESPONSIVENESS SUMMARY IN THE FOLLOWING FINAL PERMITS

Humacao-Las Piedras WTP (PR0022829)

Matuyas WTP (PR0022594)

Coto Laurel WTP (PR0025747)

Canalizo WTP (PR0026867)

Guaynabo WTP (PR0022492)

Cayey WTP (PR0022519)

Canóvanas WTP (PR0022420)

Toa Alta WWTP (PR0020869)

Corozal WWTP (PR0020451)

On **July 31, 2015**, the United States Environmental Protection Agency (EPA) issued draft National Pollutant Discharge Elimination System (NPDES) permits for Water Treatments Plants (WTP's) and Wastewater Treatment Plants (WWTPs) owned by the Puerto Rico Aqueduct and Sewer Authority (PRASA) listed above.

According to 40 Code of Federal Regulations (CFR) §124.17, at the time that any final permit decision is issued under §124.15, EPA shall issue a response to comments. This response shall (1) specify which provisions, if any, of the draft permit have been changed in the final permit decision and the reasons for the change; and (2) briefly describe and respond to all significant comments on the draft permit raised during the public comment period, or during any hearing.

Comments on behalf of PRASA were received from the following addresses:

Puerto Rico Aqueduct and Sewer Authority
PO Box 7066
Barrio Obrero Station
San Juan, PR 00916

All the comments received have been reviewed and considered in this final permit decision. A summary of and response to the comments received follows:

A. GENERAL COMMENT

In its comment letter PRASA has raised a number of issues, many of which address inclusion in the permit of conditions contained in the Water Quality Certificate (WQC) issued by EQB.

Response : EPA is providing a generalized response to PRASA's comments which relate to requirements in EQB's WQCs.

Section 301(b)(1)(C) of the Clean Water Act (CWA) requires that there be achieved effluent limitations necessary to assure that a discharge will meet Water Quality Standards (WQS) of the applicable State and Federal laws and regulations where those effluent limitations are more stringent than the technology-based effluent limitations required by Section 301(b)(1)(A) of the CWA. Section 401(a)(1) of the CWA requires that the State certify that the discharge will comply with the applicable provisions of sections 301, 302, 303, 306 and 307 of the CWA. Pursuant to Section 401(d) of the CWA any certification shall set forth any effluent limitations and other limitations, and monitoring requirements necessary to assure that any applicant for a Federal permit will comply with any applicable effluent limitations and other limitations under section 301 or 302 of the CWA, and with any other appropriate requirement of State law set forth in such certification. Also, 40 C.F.R. 122.44(d) requires that each NPDES permit shall include requirements which conform to the conditions of a State Certification under Section 401 of the CWA that meets the requirements of 40 C.F.R. 124.53. Similarly, 40 C.F.R. 124.55 requires that no final NPDES permit shall be issued unless the final permit incorporates the requirements specified in the certification under ' 124.53. Concerning the certification requirements in 40 C.F.R. 124.53(e)(1), they specify that all Section 401(a)(1) State certifications must contain conditions which are necessary to assure compliance with the applicable provisions of CWA sections 208(e), 301, 302, 303, 306, and 307 and with appropriate requirements of State law.

EQB issued final WQCs certifying that pursuant to Section 401(a)(1) of the CWA, after due consideration of the applicable provisions established under Sections 208(e), 301, 302, 303, 304(e), 306 and 307 of the CWA concerning water quality requirements, there is reasonable assurance that the discharge will not cause violations to the applicable WQSs, provided that the effluent limitations set forth in the WQCs are met by the above facility.

The effluent limitations (where more stringent than technology-based effluent limitations), monitoring requirements and other appropriate requirements of State law (including footnotes, Special Conditions, etc.) specified in the final WQC issued by the EQB were incorporated by EPA into the NPDES permit as required by Section 301(b)(1)(C) and 401(d) of the CWA and the applicable regulations. Therefore, concerns and comments regarding the WQC must be directed to EQB or to the Superior Court.

Also, in the event that EPA receives a revised or modified WQC, we would consider modification of this permit, subject to all applicable federal requirements, to include revised WQC requirements and conditions.

B. HUMACAO – LAS PIEDRAS WTP COMMENTS

- 1) **Comment 1:** The acronym used, thru the entire permit, for the “Puerto Rico Water Quality Standards Regulation (PRWQS)” is incomplete. EPA must correct it to PRWQSR.

Response: The referenced item has been modified according to PRASA’s comment.

- 2) **Comment 2:** The acronyms TBEL, WQBEL and CFR must be defined before they are used. Also the acronym TBELS does not require to have the “S” at the end.

Response: The referenced item has been modified according to PRASA’s comment.

- 3) **Comment 3:** The date used (“June 2, 2015”) for the Environmental Quality Board’s (EQB’s) certification corresponds to the Draft Water Quality Certificate (DWQC). Therefore, this section must be modified accordingly. In other instances, when the EPA’s Final NPDES permit be issued, this section must make reference to the issuance date of the EQB’s Final WQC.

Response: The final permit has been revised to read as the final WQC.

- 4) **Comment 4:** The acronym WLA (Waste Load Allocation) must be defined previous to be used.

Response: The referenced item has been modified according to PRASA’s comment.

- 5) **Comment 5: “Flow”** – PRASA does not understand why EPA is requiring “monitoring only” for the “Average monthly” and “Average weekly” columns. This is a filtration facility not a publicly owned treatment work (POTW). Therefore, PRASA requests that dashes (--) must be included in both columns.

Response: The final permit has been revised to read as the final WQC.

- 6) **Comment 6:** “Chlorine, Residual” – EPA must revise the units of this parameter.

Response: The final permit has been revised to read as the final WQC.

- 7) **Comment 7: “Dissolved Oxygen”** – The maximum daily limitation must be corrected to request results higher than or equal to 5 mg/L. The symbol “greater than” (>) must be substituted by the symbol “greater than or equal” (\geq). Also, in order to avoid confusion, the following footnote must be added to clarify the dissolved oxygen limitation.

Response: This was a typographical error; the referenced item has been modified

according to PRASA's comment.

- 8) **Comment 8: Footnote (2)** – It must be modified. As written it makes reference to comply “with permit limits for bacterial indicator(s)”. However, the permit does not include limitations for bacterial parameters. EPA must clarify or in the alternative, delete it.

Response: The final permit has been revised to read as the final WQC.

- 9) **Comment 9: No Net Addition Limitations:** PRASA requests that a footnote condition, similar be added for the parameters indicated below. This footnote will allow credits for those substances already in the intake and for parameters that the plant does not have any control. The presence of these parameters in the discharge is merely due to the incoming river water. Following are the parameters that PRASA is requesting such limitation: BOD₅, Cd, CN, Cu, P, Pb, TDS, Turbidity and Zn.

Response: The final permit has been revised to read as the final WQC.

- 10) **Comment 10: Special Condition 13** – It indicates that “a semiannual report shall be submitted to EQB and EPA”. However, it does not indicate either the person or the specific office from both agencies that PRASA must report. EPA must be more specific.

Response: The referenced item has been modified according to PRASA's comment.

C. **MATUYAS WTP COMMENTS**

1) **Comment, Background:** The acronyms TBEL, WQBEL and CFR must be defined before they are used. Also the acronym TBELS does not require to have the “S” at the end.

Response: The referenced item has been modified according to PRASA's comment.

2) **Comment 2, Background:** The date used (“June 24, 2015”) for the Environmental Quality Board's (EQB's) certification corresponds to the Draft Water Quality Certificate (DWQC). On August 21, 2015 EQB issued the Final WQC. Therefore this section should be modified accordingly.

Response: The final permit has been revised according to PRASA's comments.

3) **Comment 3, Background, Impaired Waters and Total maximum Daily Loads (TMDLs)**: The acronym WLA (Waste Load Allocation must be defined. Also, this

section makes reference to “any WLA assigned to the Permittee”. However, this permit does not include any dilution allowance approved by EQB. EPA must clarify.

4) Comment 4, Effluent Limitations Table, BOD₅: PRASA does not understand why EPA is requiring “24 Hr. Composite” samples type. This is a filtration facility not a publicly owned treatment work. Therefore, PRASA requests that “Grab” samples be required, as established in EQBs Final WQC.

Response: This was a typographical error, the final permit has been revised according to PRASA’s comments.

5) Comment 5, Effluent Limitations Table, Dissolved Oxygen: In order to avoid confusion, the following footnote must be added to clarify the dissolved oxygen limitation:

“The Dissolved Oxygen limit is an instantaneous minimum.”

Response: The requested footnote for Dissolved Oxygen was added to the final permit.

6) Comment 6, Effluent Limitations Table, Fecal Coliforms: this parameter is regulated ONLY in two (2) instances; the Geometric Mean and in the % exceeding 400. The 400 value is not a daily maximum limit. Therefore, dashes (--) must be included in the Maximum daily column, instead of the 400 value.

Response: A typographical error was made in the sample type of the % of exceeding Limit: the sample type have been revised to “Geometric Mean” instead of “Calculated”. This should clarify PRASA’s concerns.

7) Comment 7, Effluent Limitations Table, Flow: EPA must explain why footnote (2) applies to this parameter.

Response: This was a typographical error, the final permit has been revised according to PRASA’s comments.

8) Comment 8, No Net Addition Limitations: EQB’s final WQC included No Net Addition Limitations for some parameter, As, BOD%, Cd, CN, Cu, Fecal Coliforms, Hg, P, Pb, Zn. Based on EQB’s final WQC, PRASA requests that the parameters identified above by identified with the footnote (5) referring to the following condition:

No Net Addition Limitation

- *If the applicable water quality standard is not exceeded in the inlet, the established effluent limitation shall not be exceeded at the discharge point 001.*
- *If the applicable water quality standard is exceeded in the inlet, the same measurement shall be achieved at the discharge point 001.*

In order to demonstrate compliance with the No Net Addition Limitation, influent (raw water from Río Maunabo) and effluent (filters backwash and sedimentation tanks drains)

monitoring must be conducted at the frequency specified herein. The permittee shall take into consideration the residence time of the influent when scheduling influent and effluent monitoring. The permittee shall report the results of these measurements in the Discharge Monitoring Reports. Alternately, the permittee may forego influent monitoring and comply with the applicable water quality standard as effluent limitation at the end of the pipe of the discharge.

Response: The referenced limitation was included in the final permit in accordance with EQB's final WQC.

9) Comment 9, Special Condition 16: It indicates that "a semiannual report shall be submitted to EQB and EPA". However, it does not indicate either the person or the specific office from both agencies that PRASA must report. EPA must be more specific.

Response: The referenced item has been modified according to PRASA's comment.

D. COTO LAUREL WTP COMMENTS

1) Comment 1, Effluent Limitations Table: "BOD₅-day" – PRASA believes that the effluent limitation for this parameter was included in the wrong column ("Average monthly"). As it is written, the permit requires 5 mg/L monthly average. However, this is a filtration facility not a publicly owned treatment work (POTW).

Therefore, PRASA requests that dashes (--) be included in the column of "Average monthly" and that the effluent limitation of 5 mg/L be moved to the "Maximum daily" column, as established in other draft permits for filtration plants.

Response: This was a typographical error. The table was revised

2) Comment 2, "Dissolved Oxygen": In order to avoid confusion, the following footnote must be added to clarify the dissolved oxygen limitation: "The Dissolved Oxygen limit is an instantaneous minimum"

Response: A footnote has been added to address PRASA's concern.

3) Comment 3, "Sulfide (undissociated H₂S)": This parameter was wrongly written. EPA must correct it.

Response: This was a typographical error, the table was revised.

4) Comment 4, "Temperature": EPA must correct the units of this parameter, eliminating oF.

Response: This was a typographical error, the table was revised.

5) Comment 5, “Total Ammonia”: The draft WQC of June 24 2015 requires monthly monitoring. PRASA requests that this requirement be changed from 1/Daily to **1/Month** as stated by EQB in the draft WQC.

Response: Corrected to reflect EQB’s Final WQC issuance date.

6) Comment 6, Notes, Footnotes and Abbreviations

Footnote (2) – It must be modified. As written it makes reference to comply “with permit limits for bacterial indicator(s)”. However, the permit does not include limitations for bacterial parameters. EPA must clarify or in the alternative, delete it.

Response: Footnote was modified to address PRASA’s concerns.

7) Comment 7, No Net Addition Limitations: PRASA requests that a footnote condition, similar to that included in the draft permits of Canóvanas WTP and Cayey WTP, be added for the parameters indicated below. This footnote will allow credits for those substances already in the intake and for parameters that the plant does not have any control. The presence of these parameters in the discharge is merely due to the incoming river water.

Following are the parameters that PRASA is requesting such limitation:

No Net Addition Limitations
BOD ₅
Cu
NH ₃
P
Pb
undissociated H ₂ S
TDS

Response: A Footnote (6) reflecting the No Net Addition Limitation has been added for BOD₅, Copper, Lead, and Total Phosphorus, a determined in EQB’s final WQC.

8) Comment 8, Special Condition 16: It indicates that “a semiannual report shall be submitted to EQB and EPA”. However, it does not indicate either the person or the specific office from both agencies that PRASA must report. EPA must be more specific.

Response: The referenced item has been modified according to PRASA’s comment.

E. CANALIZO WTP COMMENTS

1) Comment 1, General Comments: It indicates that EPA has classified the discharge of Canalizo WTP as a Major discharge.

The acronym used for the “Puerto Rico Water Quality Standards Regulation (PRWQS)” is incomplete. EPA must correct it to PRWQSR through the entire permit.

The numbering in some pages must be corrected. Some pages indicate that the document has a total of 20 pages, but in others indicates a total of 11 pages.

Response: Canalizo WTP is a “Minor” discharge, and it was corrected on the cover page. The acronym for Puerto Rico Water Quality Standards was revised.

Pages number were revised to address PRASA concerns.

2) Comment 2, Background: The acronyms TBEL, QBEL and CFR must be defined before they are used. Also the acronym TBELS does not require to have the “S” at the end.

Response: The referenced item has been modified according to PRASA’s comment.

3) Comment 3, Background: The acronyms TBEL, QBEL and CFR must be defined before they are used. Also the acronym TBELS does not require to have the “S” at the end.

Response: The referenced item has been modified according to PRASA’s comment.

4) Comment 4: The date used (“June 26, 2015”) for the Environmental Quality Board’s (EQB’s) certification corresponds to the Draft Water Quality Certificate (DWQC). Therefore, this section must be modified accordingly. In other instances, when the EPA’s Final NPDES permit be issued, this section must make reference to the issuance date of the EQB’s Final WQC.

Response: The final permit has been revised to read as the final WQC.

5) Comment 5, Effluent Limitations Table, BOD₅: PRASA does not understand why EPA is requiring “24 Hr. Composite” samples type. This is a filtration facility not a publicly owned treatment work. Therefore, PRASA requests that dashes (--) must be included and that “Grab” samples be required, as established in EQBs Final WQC.

Response: These were typographical errors, the final permit has been revised according to PRASA’s comments.

6) Comment 6, Effluent Limitations Table, Dissolved Oxygen: In order to avoid confusion, the following footnote must be added to clarify the dissolved oxygen limitation:

“The Dissolved Oxygen limit is an instantaneous minimum.”

Response: The requested footnote for Dissolved Oxygen was added to the final permit.

7) Comment 7, Footnote (2): it must be modified. As written it makes reference to comply “with permit limits for bacterial indicators”. However, the permit does not include limitations for bacterial parameter. EPA must clarify or in the alternative, delete it.

Response: Footnote was modified to address PRASA’s concerns.

8) Comment 8, Footnotes (γ), (δ), and (ξ): The footnotes included in EQB’s WQC are missing and they must be added to the table.

Response: Footnotes were included to the table as established in EQB’s Final WQC.

9) Comment 9, Footnotes: No Net Addition Limitation: PTASA requests that a footnote condition be added for the parameters indicated below. This footnote will allow credits for those substances already in the intake and for the parameters that the plant does not have any control. The presence of these parameters in the discharge is merely toe to the incoming river water.

Following are the parameters that PRASA is requesting such limitation:

No Net Addition Limitations
Canalizo WTP (PR0026867)
Parameters
Ag
BOD5
Cd
Cr+3
Cr+6
CN
Cu
Hg
NH3
P
Pb
TDS
Zn

Response: EQB’s final WQC included No Net Addition Limitations for some of the requested parameters, BOD, Copper, Lead, Total Dissolved Solids, Total Phosphorus and Zinc. The No Net Addition is specified for these parameters in the permit in footnote (8). The language included is describe below.

No Net Addition Limitation

- *If the applicable water quality standard is not exceeded in the inlet, the established effluent limitation shall not be exceeded at the discharge point 001.*
- *If the applicable water quality standard is exceeded in the inlet, the same measurement shall be achieved at the discharge point 001.*

In order to demonstrate compliance with the No Net Addition Limitation, influent (raw water from Río Maunabo) and effluent (filters backwash and sedimentation tanks drains) monitoring must be conducted at the frequency specified herein. The permittee shall take into consideration the residence time of the influent when scheduling influent and effluent monitoring. The permittee shall report the results of these measurements in the Discharge Monitoring Reports. Alternately, the permittee may forego influent monitoring and comply with the applicable water quality standard as effluent limitation at the end of the pipe of the discharge.

F. GUAYNABO WTP COMMENTS

1) **Comment 1, General:** The acronyms TBEL, WQBE and CFR must be defined before they are used. Also the acronym TBELS does not require the “S” at the end. The acronym used for “Puerto Rico Water Quality Standards Regulation (PRWQS)” is incomplete. EPA must correct it to PRWQSR thru the entire permit.

Response: These requested modifications were addressed in the final permit.

2) **Comment 2, General:** The plant NPDES number in the header of all pages must be corrected to PR0022438.

Response: This typographical error was corrected in the final permit.

3) **Comment 3, Water Quality Certificate:** The date used (“June 26, 2015”) for EQB’s certification corresponds to the draft Water Quality Certificate. Therefore, when EPA issues the Final NPDES permit for the facility, the date must be modified to reflect the date of the final Water Quality Certificate issued by EQB.

Response: The date of the final Water Quality Certificate (“August 24, 2015”) was changed in the permit.

4) **Comment 4, Effluent Limitations Table BOD:** PRASA requested the modification of the sample type required in the draft permit for BOD from 24-hr composite to Grab, as established in EQB's Final WQC.

Response: The sample type for BOD was modified from 24-hr composite to Grab, as established in the August 24 2015 WQC for the facility.

5) **Comment 5, Dissolved Oxygen:** PRASA requested the addition of a footnote that says "The Dissolved Oxygen limit is an instantaneous minimum" for this parameter.

Response: The requested footnote for Dissolved Oxygen was added to the final permit.

6) **Comment 6, Mercury:** PRASA requested the elimination of the effluent limitation for Mercury since they believe that based on historical data, this facility has no reasonable potential that the applicable water quality standard could be exceeded. In addition, PRASA indicated that if the limit stays, a "No Net Addition Limitation" footnote should be added to the permit.

Response: EPA has incorporated this Special Condition pursuant to the final WQC mandated by EQB. See response to A, above. .

7) **Comment 7, Notes, Footnotes and Abbreviations:** PRASA requested the modification of footnote (3) of the effluent limitations table to clarify that this permit does not include effluent limitations for any bacterial parameter.

Response: Footnote (3) of the effluent limitations table was modified to address PRASA's request in the final permit.

8) **Comment 8, Effluent Limitations Table - No Net Addition Limitations:** PRASA requested that a footnote indicating "No Net Addition Limitation" be added to the following parameters: BOD, Copper, Mercury, Ammonia, Phosphorous and Lead.

Response: EQB's Final WQC of August 24, 2015, adds the footnote of "No Net Addition Limitation" for the all the parameters requested but Ammonia. Therefore, the footnote was added to all parameters but Ammonia in the final NPDES permit.

9) **Comment 9, Special Condition 16:** PRASA requested clarification on this special condition as to whom from EQB and EPA shall receive copies off the reports requested therein.

Response: The Special condition was modified in the final permit to indicate which offices within EPA and EQB shall receive the reports requested.

G. CAYEY WTP COMMENTS

1) **Comment 1, Cover Page:** The outfall longitude must be corrected according to the coordinates included in the NPDES Permit Renewal Application dated May 27, 2013. It must read as follows:

66°, 10', 05" W

Response: The referenced item has been modified according to PRASA's comment.

2) **Comment 2:** The acronym used, thru the entire permit, for the "Puerto Rico Water Quality Standards Regulation (PRWQS)" is incomplete. EPA must correct it to PRWQSR.

Response: The referenced item has been modified according to PRASA's comment.

3) **Comment 3:** The acronyms TBEL, WQBEL and CFR must be defined before they are used. Also the acronym TBELS does not require to have the "S" at the end.

Response: The referenced item has been modified according to PRASA's comment.

4) **Comment 4:** The date used ("June 26, 2015") for the Environmental Quality Board's (EQB's) certification corresponds to the Draft Water Quality Certificate (DWQC). Therefore, this section must be modified accordingly. In other instances, when the EPA's Final NPDES permit be issued, this section must make reference to the issuance date of the EQB's Final WQC.

Response: The final permit has been revised to read as the final WQC.

5) **Comment 5:** The acronym WLA (Waste Load Allocation) must be defined. Also, this section makes reference to "any WLA assigned to the Permittee". However, this permit does not include any dilution allowance approved by EQB. EPA must clarify.

Response: This was a typographical error; the referenced item has been modified according to PRASA's comment.

6) **Comment 6, "Flow":** PRASA does not understand why EPA is requiring "monitoring only" for the "Average monthly" and "Average weekly" columns. This is a filtration facility not a publicly owned treatment work (POTW). Therefore, PRASA requests that dashes (--) must be included in both columns.

Response: The final permit has been revised to read as the final WQC.

7) **Comment 7, "BOD₅-day":** This parameter must be identified with the footnote (*) related to the "No Net Addition Limitation". The plant obviously does not have control in the removal of this parameter since its treatment process is not biological. For this reason, PRASA requests that BOD5 be added to those parameters with intake credits.

Response: The final permit has been revised to read as the final WQC.

8) Comment 8, “Chlorine, Residual”: EPA must revise the units of this parameter.

Response: The final permit has been revised to read as the final WQC.

9) Comment 9, “Dissolved Oxygen”: The maximum daily limitation must be corrected to request results higher than or equal to 5 mg/L. The symbol “greater than” (>) must be substituted by the symbol “greater than or equal” (\geq). Also, in order to avoid confusion, the following footnote must be added to clarify the dissolved oxygen limitation.

Response: This was a typographical error; the referenced item has been modified according to PRASA’s comment.

10) Comment 10, “Total Ammonia”: This parameter must be also identified with the footnote (*) related to the “No Net Addition Limitation”. The plant obviously does not have control in the removal of this parameter since its treatment process is not biological. For this reason, PRASA requests that this parameter be also added to those parameters with intake credits.

Response: The final permit has been revised to read as the final WQC.

11) Comment 11, “Total Dissolved Solids”: PRASA does not understand why this parameter is still in the permit (or maybe its monitoring frequency is not reduced). The historic data clearly shows that there is no reasonable potential that the applicable water quality standard (WQS) be exceeded. From more than 70 analyses conducted since December 2008 until June 2015, only one (1) exceedance was reported (but it occurred more than three (3) years ago). This demonstrates that the plant consistently comply with the WQS. For these reasons, PRASA requests that this parameter be deleted from the permit. The historic data and the reasonable potential analysis (RPA) are included.

If the parameter remains in the permit, it also must be identified with the footnote (*) related to the “No Net Addition Limitation”. The filtration plant controls the suspended, colloidal and settleable solids but not the dissolved ones. For this reason, if the parameter is not deleted from the permit, PRASA requests that this parameter also be added to those parameters with intake credits.

Response: The final permit has been revised to read as the final WQC.

12) Comment 12, “Total Phosphorus”: EPA must revise the units of this parameter.

Response: The final permit has been revised to read as the final WQC.

13) Comment 13, Footnote (2): It must be modified. As written it makes reference to comply “with permit limits for bacterial indicator(s)”. However, the permit does not include limitations for bacterial parameters. EPA must clarify or in the alternative, delete it.

Response: The final permit has been revised to read as the final WQC.

14) Comment 14, Special Conditions Numbering: The numbering of the special conditions in pages 7 and 8 must corrected.

Response: The referenced item has been modified according to PRASA’s comment.

15) Comment 15, Special Condition 10: It indicates that “a semiannual report shall be submitted to EQB and EPA”. However, it does not indicate either the person or the specific office from both agencies that PRASA must report. EPA must be more specific.

Response: The referenced item has been modified according to PRASA’s comment.

H. CANOVANAS WTP COMMENTS

1) **Comment 1 (Rationale for Permit Requirements):** The acronyms TBEL, WQBE and CFR must be defined before they are used. Also the acronym TBELS does not require the “S” at the end. The acronym used for “Puerto Rico Water Quality Standards Regulation (PRWQS)” is incomplete. EPA must correct it to PRWQSR thru the entire permit.

Response: These requested modifications were addressed in the final permit.

2) **Comment 2, Water Quality Certificate:** The date used (“June 26, 2015”) for EQB’s certification corresponds to the draft Water Quality Certificate. Therefore, when EPA issues the Final NPDES permit for the facility, the date must be modified to reflect the date of the final Water Quality Certificate issued by EQB.

Response: The date of the final Water Quality Certificate (“August 25, 2015”) was changed in the permit.

3) **Comment 3, Impaired Waters and TMDLs:** The acronym WLA (waste Load allocation) must be defined. EPA must clarify that this permit does not include any dilution allowance approved by EQB.

Response: These requested modifications were addressed in the final permit.

4) **Comment 4, Effluent Limitations Table BOD:** PRASA requested the modification of the sample type required in the draft permit for BOD from 24-hr composite to Grab, as established in EQB's Final WQC. In addition, PRASA requested that BOD must be identified with a footnote that indicates "No Net Addition Limitation".

Response: The sample type for BOD was modified from 24-hr composite to Grab, as established in the August 25, 2015 WQC for the facility. In addition, the footnote "No Net Addition Limitation", was also added to the BOD parameter as established in the final WQC.

5) **Comment 5, Cyanide:** PRASA requested the modification of the sample frequency for Cyanide from Monthly to Quarterly as established in EQB's final WQC.

Response: The sample frequency for Cyanide was modified from Monthly to Quarterly, as established in the August 25, 2015 WQC for the facility.

6) **Comment 6, Dissolved Oxygen:** PRASA requested the addition of a footnote that says "The Dissolved Oxygen limit is an instantaneous minimum" for this parameter.

Response: The requested footnote for Dissolved Oxygen was added to the final permit.

7) **Comment 7, Notes, Footnotes and Abbreviations:** PRASA requested the modification of footnote (4) of the effluent limitations table to clarify that this permit does not include effluent limitations for any bacterial parameter.

Response: Footnote (4) of the effluent limitations table was modified to address PRASA's request in the final permit.

8) **Comment 8, Special Condition 17:** PRASA requested clarification on this special condition as to whom from EQB and EPA shall receive copies off the reports requested therein.

Response: The Special condition was modified in the final permit to indicate which offices within EPA and EQB shall receive the reports requested.

I. TOA ALTA WWTP COMMENTS

1) **Comment 1: (Special Condition 16):** PRASA requested clarification on this special condition as to whom from EQB and EPA shall receive copies off the reports requested therein.

Response: The Special condition was modified in the final permit to indicate which offices within EPA and EQB shall receive the reports requested.

2) **Comment 2: (Special Condition 17):** PRASA requested clarification on this special condition as to whom from EQB and EPA shall receive copies off the reports requested therein.

Response: The Special condition was modified in the final permit to indicate which offices within EPA and EQB shall receive the reports requested

COROZAL WWTP COMMENT

1) Comment 1 - Background: The acronyms TBEL, QBEL and CFR must be defined before they are used. Also the acronym TBELS does not require to have the “S” at the end.

Response: The referenced item has been modified according to PRASA’s comment.

2) Comment 2- Background: The date used (“June 10, 2015”) for the Environmental Quality Board’s (EQB’s) certification corresponds to the Draft Water Quality Certificate (DWQC). On August 21, 2015 EQB issued the Final WQC. Therefore this section should be modified accordingly.

Response: The final permit has been revised according to PRASA’s comments.

3) Comment 3 - Background: In the Antidegradation and Anti-backsliding Requirements, the acronym PRWQS used for the “Water Quality Standards Regulation” is incomplete.

Response: The referenced item has been modified according to PRASA’s comment.

4) Comment 4 – Effluent Limitations Table, BOD₅ minimum % removal: the “Minimum sampling frequency” for the minimum % removal must be modified to “1/Month”. Since this is a calculation (not a sampling) and it is calculated every month, PRAS understands that it must appear as “1/Month”, as established for TSS. The “1/week” term can be erroneously interpreted that the BOD₅ % removal must be calculated weekly. Also, dashes (--) must be added to the “Average weekly” column.

Response: This was a typographical error, the final permit has been revised according to PRASA’s comments.

5) Comment 5 – Effluent Limitations Table, Fecal Coliforms: This parameter is regulated ONLY in two (2) instances; the Geometric Mean and in the % Exceeding 400. The 400 value is not a daily maximum limit. Therefore, dashes (--) must be included in the “Maximum daily” column, instead of the 400 value.

Response: This was a typographical error, the final permit has been revised according to PRASA’s comments.

6) Comment 6 – Effluent Limitations Table, Residual Chlorine: This parameter must be identified with footnote (8).

Response: This was a typographical error, the final permit has been revised according to PRASA’s comments.

7) Comment 7 – Effluent Limitations Table, Sulfide: EPA must clarify if this parameter refers to “Total Sulfide or undissociated H₂S.” Also the reference to footnote (8) must be deleted.

Response: Table A-1 was revised to clarified the parameter is “undissociated H₂S”. Also, footnote (8) was deleted.

8) Comment 8 – Effluent Limitations Table, Total Coliforms: The units of this parameter must be corrected.

Response: This was a typographical error, the final permit has been revised according to PRASA’s comments.

9) Comment 9 – Special Condition 16: It indicates that “a semiannual report shall be submitted to EQB and EPA”. However, it does not indicate either the person or the specific office from both agencies that PRASA must report. EPA must be more specific.

Response: The referenced item has been modified according to PRASA’s comment.